

**Dinsmore & Shohl** LLP  
ATTORNEYS

John E. Selent  
502-540-2315  
john.selent@dinslaw.com

August 30, 2006

**RECEIVED**

AUG 31 2006

PUBLIC SERVICE  
COMMISSION

**Via Hand Delivery**

Hon. Beth O'Donnell  
Executive Director  
Public Service Commission  
211 Sower Blvd.  
P. O. Box 615  
Frankfort, KY 40601

**Re: Petition of Foothills Rural Telephone Cooperative Corporation, Inc. for Arbitration of Certain Terms and Conditions of Proposed Interconnection Agreement with Cellco Partnership d/b/a Verizon Wireless, GTE Wireless of the Midwest Incorporated d/b/a Verizon Wireless, and Kentucky RSA No. 1 Partnership d/b/a Verizon Wireless; Case No. 2006-00292**

Dear Ms. O'Donnell:

Foothills Rural Telephone Cooperative Corporation, Inc. hereby joins in the Motion to Schedule Informal Conference filed by Ballard Rural Telephone Cooperative Corporation, Inc. in Case No. 2006-00215, a copy of which is attached hereto.

Thank you, and if you have any questions, please call me.

Very truly yours,

DINSMORE & SHOHL LLP



John E. Selent

JES/bmt

Enclosure

cc: All Parties of Record (w/enclosure)

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

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PUBLIC SERVICE  
COMMISSION

In the Matter of:

Petition of Ballard Rural Telephone Cooperative )  
Corporation, Inc. for Arbitration of Certain Terms )  
and Conditions of Proposed Interconnection )  
Agreement with American Cellular Corporation )  
f/k/a ACC Kentucky License LLC, )  
Pursuant to the Communications Act of 1934, )  
as Amended by the Telecommunications )  
Act of 1996 )

Case No. 2006-00215

**MOTION TO SCHEDULE INFORMAL CONFERENCE**

Petitioner, Ballard Rural Telephone Cooperative Corporation, Inc. ("Ballard Rural"), by counsel, pursuant to 807 KAR 5:001, Section 4(4) hereby respectfully moves the Public Service Commission of the Commonwealth of Kentucky (the "Commission") to schedule an informal conference in the above matter for the purposes of discussing, among other things: 1) the impact on the procedural schedule of the Commission's recent orders requiring Petitioner to conduct a TELRIC cost study; and 2) the advisability of bifurcating this proceeding in order to address (a) the non-cost/price issues in one part of this proceeding pursuant to the present procedural schedule and (b) the cost/price issues pursuant to a new procedural schedule in order to give the rural ILEC's time to conduct the TELRIC cost studies ordered by the Commission.

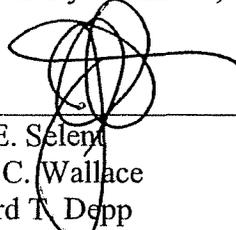
As grounds for this motion, Petitioner quotes the order of the Commission in this matter dated August 18, 2006: ". The July 25, 2006 Order remains in full force and effect with the sole exception of permitting the RLECs additional time, if needed to file their TELRIC-based cost studies and written testimony." Id. Additionally, as the testimony of Steven E. Watkins, prefiled in this matter on August 16, 2006, demonstrates, the cost involved in completing TELRIC could be in the

neighborhood of \$50,000 - \$100,000 and, more to the point, the time required to complete such studies could be several months, or more. Id. Watkins testimony at p. 11-12.

Petitioner believes such an informal conference will promote a just and efficient resolution of this matter. Finally, Petitioner asks that the parties be allowed to participate at this informal conference, at their option, either by telephone or in person.

Therefore, Petitioner asks that the Commission schedule an informal conference in this matter to be held at the earliest convenient date.

Respectfully submitted,



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John E. Selent  
Holly C. Wallace  
Edward T. Depp  
**DINSMORE & SHOHL LLP**  
1400 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202  
(502) 540-2300 (telephone)  
(502) 585-2207 (fax)

**COUNSEL TO BALLARD RURAL  
TELEPHONE COOPERATIVE  
CORPORATION, INC.**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served by first-class United States mail and electronic mail on this 30<sup>th</sup> day of August, 2006, to the following individual(s):

Jeff Yost, Esq.  
Mary Beth Naumann, Esq.  
Jackson Kelly PLLC  
175 East Main Street  
Lexington, KY 40507  
jyost@jacksonkelly.com  
mnaumann@jacksonkelly.com

*Counsel to Cingular*

Kendrick R. Riggs, Esq.  
Douglas F. Brent, Esq.  
Stoll Keenon Ogden PLLC  
2000 PNC Plaza  
500 West Jefferson Street  
Louisville, Kentucky 40202  
kendrick.riggs@skofirm.com  
douglas.brent@skofirm.com

*Counsel to T-Mobile and Counsel to Verizon*

Mark R. Overstreet, Esq.  
Stites & Harbison PLLC  
421 West Main Street  
P.O. Box 634  
Frankfort, Kentucky 40602-0634  
moverstreet@stites.com

*Counsel to AllTel*

John N. Hughes, Esq.  
Attorney at Law  
124 West Todd Street  
Frankfort, Kentucky 40601  
jnhughes@fewpb.net

*Counsel to Sprint PCS*

Holland N. McTyeire, Esq.  
Greenbaum Doll & McDonald PLLC  
3500 National City Tower  
Louisville, Kentucky 40202  
HNM@gdm.com

*Counsel to ACC*

Tom Sams  
NTCH-West, Inc.  
1600 Ute Avenue, Suite 10  
Grand Junction, Colorado 81501  
toms@cleartalk.net

Bhugin M. Modi  
ComScape Telecommunications, Inc.  
1926 10<sup>th</sup> Avenue North  
Suite 305  
West Palm Beach, FL 33461  
bmodi@comscape.net



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**COUNSEL TO BALLARD RURAL  
TELEPHONE COOPERATIVE  
CORPORATION, INC.**